

*** Filed ***
07:22 PM, 08 JUN, 2025
U.S.D.C., Eastern District of New York

Plaintiff: IME WatchDog, Inc.,

vs.

Case No. Civil Action No. 1:22-cv-1032 (PKC) (JRC)

Defendant: Safa Abdulrahim Geraldi, et al.,

AFFIDAVIT (SWORN STATEMENT)

Date: March 24 2023

My legal name is **Yaniv Liron** ("Affiant") and acknowledge I am:

- a.) Age: 42 years old
- b.) Address: 99 Wall Street 1536, New York, New York, 10005
- c.) Residency: New York

Being duly sworn, hereby swear under oath that: My company, Lumina Systems Inc, was contacted by Adam Rosenblatt, in regards to building him a website for a company named "IME Guard Dogs".

My company replied with a proposal. This website was never built, no follow up was ever done and no transactions ever occurred with him.

That was the extent of my contact with Adam Rosenblatt.

Months later, Safa Geraldi, requested for my company to build her a website named IME Companions.

That website was built, however currently a different company is working on the website and has renewed it.

I am currently in Israel, when I received the subpoena I was in Israel as it was delivered to a mail service handling the company's mail.

Under penalty of perjury, I hereby declare and affirm that the above-mentioned statement is, to the best of my knowledge, true and correct.

Affiant's Signature:

 Date: 03/24/2023